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Our File No.
38110-100

October 25, 2021

By ECF and Email

Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl St.
New York, NY 10007

Re: *Kleeberg, et al. v. Eber, et al.*
Docket No. 16-cv-9517 (LAK)

Plaintiffs' October 22, 2021 Letter Application Requesting Additional Time to Address Subject Matter Jurisdiction

Dear Judge Kaplan:

We are in receipt of Plaintiffs' letter application, dated October 22, requesting additional time to respond to Defendants' Proposed Findings of Fact and Conclusions of Law insofar as it calls for dismissal for lack of subject matter jurisdiction under the *Princess Lida* Doctrine.

Plaintiffs, by requesting 14 days (until November 5) to address the *Princess Lida* Doctrine's application to this case, are, in sum and substance, requesting that this issue be briefed and presented to the Court in the same manner as a motion under Local Rule 6.1. Defendants consent to Plaintiffs' request on condition that Defendants be permitted 7 days for reply papers (until November 12).

Plaintiffs' letter application presents a preview of their arguments concerning the *Princess Lida* Doctrine that is more appropriately presented in briefing rather than a letter application for an extension of time. Defendants respectfully submit that they be permitted to address any such arguments in a reply brief.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Frank T. Santoro'.

Frank T. Santoro

A handwritten signature in black ink, appearing to read 'Lewis A. Kaplan'.

SO ORDERED

cc: Counsel of Record

LEWIS A. KAPLAN, JSDJ
10/26/21